

Before the

**Federal Communications Commission
Washington, D.C. 20554**

I n the Matter of)	
)	
Amendment of Part 22 of the Commission’s)	WT Docket No. 03-103
Rules To Benefit the Consumers of Air-)	
Ground Telecommunications Services)	
)	
Biennial Regulatory Review—Amendment of)	
Parts 1, 22, and 90 of the Commission’s Rules)	

Matt Edwards
POBox 5098
Montauk NY 11954
917 514 2168
E-Mail comment
Montaukcell@aol.com

Dear FCC:

I am an airground licensee, but I make these comments as a member of the flying public.

1. To allow the on-board in-flight use of any RF device is to invite disaster. No tests have been run, nor are any tests possible, that anticipate the interaction of RF devices which are behaving properly but may also be operating IMPROPERLY, and the resultant effect on navigational devices.

The mixing of signals that might be encountered in such a closed environment as an aircraft cabin, including 800 MHz, 1900 MHz, 2.5 GHz, 902-928 MHz, etc. is unable to be predicted. Hence no decision can be reached as to safety issues.

2. Regulators have imposed strict regulations to protect non-smokers from SECOND-HAND cigarette smoke. How are we passengers to be protected from SECOND HAND RF? In economy class, no surrounding passenger is over three feet away, often only half that distance. Could the cumulative RF be damaging or medically dangerous? What about users of heart pacemakers?

3. The effect of "CELL YELL" is well known. Are adjacent passengers to be exposed to loud multiple conversations, encouraged by the presumably lower airtime rates of traditional cellular or PCS? At least the GTE Airfone is (a) expensive (b) only one instrument per row, which limits usage.

4. Even the segregation of cell-phone and non-cell-phone passengers into different sections of the cabin simply means that RF-emitting devices are being moved into one corner of the flying microwave oven. And what of the reflections from RF emitters? Could the fuselage shape actually focus the signals to increase biological damage?

If the Commission allows cell phone use in flight, there will be a very high percentage of users who will utilize their "free" minutes for the entire flight, annoying and "frying" all their neighbors for hours.

5. Many airliners travel within radio range of points within Canada, the Bahamas, and Mexico. The Commission should carefully study the issue of unwanted cell phone/PCS transmissions taking place, which negatively impact foreign carriers and may violate foreign laws. Apparently Aircell, which operates an air-ground service utilizing cellular channels, has been unable to provide legal coverage in Canada; this might indicate that foreign governments frown on RF interference from airborne cellular units

Bring on the product liability lawyers!
Respectfully submitted

Matt Edwards